

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

AIG SPECIALTY INSURANCE COMPANY (f/k/a CHARTIS SPECIALTY INSURANCE COMPANY	§	NO: 6:21-CV-04191-RRS-CBW
	§	
	§	JUDGE ROBERT S SUMMERHAYS
	§	
	§	MAG. CAROL B WHITEHURST
	§	
	§	
	§	
	§	
v.	§	
KNIGHT OIL TOOLS, INC.	§	
	§	
	§	
	§	
	§	
	§	

MOTION TO ENROLL ADDITIONAL COUNSEL OF RECORD

NOW INTO COURT, through undersigned counsel, comes ACE American Insurance Company (“ACE”), which respectfully moves this Court to enroll Gregory M. Burts, of the law firm Brown Sims, PC, 1100 Poydras Street New Orleans, Louisiana 70163, to appear as additional counsel of record for ACE. Thear J. Lemoine of Brown Sims, PC, 1100 Poydras Street, 39th Floor, New Orleans, Louisiana 70163 will also remain as counsel of record for ACE. The addition of Mr. Burts as counsel of record will not delay any scheduled matter or deadlines.

WHEREFORE, ACE prays that this motion be granted and that Gregory M. Burts, of the law firm of Brown Sims, P.C. be enrolled as additional counsel of record for ACE.

[Signature on following page]

Respectfully submitted,

BROWN SIMS, PC

BY: /s/ *Thear J. Lemoine*

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**Attorneys for ACE American Insurance
Company**

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of February, 2022 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ *Thear J. Lemoine*

Thear J. Lemoine